

June 17, 2025

BY ECF

Hon. Sarah L. Cave
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Dorce, et al. v. City of New York, et al., No. 1:19-cv-02216 (JLR) (SLC)

Dear Judge Cave:

Pursuant to the Court's orders dated April 21, 2025 (ECF No. 438) and April 23, 2025 (ECF No. 439), the parties respectfully submit this joint update regarding the status of their mediation.

On June 13, 2025, a second in-person mediation session was held, once again with Hon. Steven M. Gold (Ret.) of JAMS. The parties are pleased to report that an agreement in principle was reached with respect to the financial terms relating to the proposed Round 10 class. As the parties work to address the non-monetary terms of their agreement they also continue to negotiate in good faith regarding the claims relating to Rounds 1 through 9 and intend to engage in further discussions to address a potential settlement of those claims.

Thus, the parties respectfully propose to jointly update the Court regarding the status of their discussions and related matters by August 1, 2025 (45 days from today). The parties also request that the Court extend the current stay of the case until August 1, 2025.

Respectfully submitted,

PLAINTIFFS

ROPES & GRAY LLP

By: /s/ Gregg L. Weiner

Gregg L. Weiner

Alexander B. Simkin

Phillip G. Kraft

Mohammed S. Hassan

Casey M. Berger

1211 Avenue of the Americas

New York, NY 10036

(212) 596-9000

*Attorneys for Plaintiffs McConnell Dorce and
Sherlivia Thomas-Murchison*

WHITE & CASE LLP

By: /s/ Keith H. Wofford

Keith H. Wofford

200 South Biscayne Blvd, Suite 4900

Miami, FL 33131-2352

(305) 371-2700

*Attorneys for Plaintiffs McConnell Dorce and
Sherlivia Thomas-Murchison*

VALLI KANE & VAGNINI LLP

By: /s/ Matthew L. Berman

Matthew L. Berman

Robert J. Valli, Jr.

Sara Wyn Kane

Yolande I. Nicholson, Esq. *Co-Counsel*

600 Old Country Road

Garden City, NY 11530

(516) 203-7180

*Attorneys for Plaintiffs McConnell Dorce, Cecelia
Jones, and Sherlivia Thomas-Murchison*

DEFENDANTS

**OFFICE OF THE CORPORATION
COUNSEL**

By: /s/ Andrea B. Feller

Andrea B. Feller

Daniel Crandall

100 Church Street

New York, NY 10007

Attorneys for the Municipal Defendants

TARTER KRINSKY & DROGIN LLP

By: /s/ Brian J. Markowitz

Brian J. Markowitz

1350 Broadway

New York, NY 10018

(212) 216-8029

*Counsel for Defendants Neighborhood Restore
Housing Development Fund and BSDC Kings
Covenant Housing Development Fund Co.*

cc: Counsel of Record (via ECF)